

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

LIGAYA L. JANKOWSKI, by
MICHAEL T. JANKOWSKI, under
Power of Attorney

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:20-cv-530

MOTION FOR APPROVAL OF COMPROMISE SETTLEMENT

Plaintiff, Ligaya L. Jankowski, by Michael T. Jankowski, under Power of Attorney, respectfully moves for this Court's approval of the compromise settlement negotiated by the parties. In support thereof, Ligaya L. Jankowski, by Michael T. Jankowski, under Power of Attorney submits the following:

This is a Federal Tort Claims Act claim arising out of medical care provided to Ligaya L. Jankowski in July 2019 under the care of physicians who were employees of the United States of America, within the U.S. Department of Navy. Ligaya L. Jankowski, by Michael T. Jankowski, under Power of Attorney filed a federal tort claim for personal injury as a result of alleged medical malpractice. The substantive law of Virginia applies.

The parties have agreed that in consideration of the total sum of Two Million Dollars and No Cents (\$2,000,000.00) paid to the Plaintiff, the Plaintiff will agree to a full release and order of dismissal with prejudice. Each party is to bear its own respective costs.

The parties understand that this settlement is subject to further approval by the Department of Justice.

This settlement was arrived at during litigation, and the total amount of the settlement is regarded by both parties as being a fair and just resolution of this claim in contemplation of the loss incurred, the uncertainty of the outcome by continued litigation, and the additional costs and expenses associated therewith.

WHEREFORE, Plaintiff prays that the instant motion be allowed.

Respectfully submitted,

LIGAYA L. JANKOWSKI, by MICHAEL
T. JANKOWSKI, Under Power of Attorney

By: /s/ Brewster S. Rawls
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Certificate of Service

I certify that on July 23, 2021, the foregoing was served via electronic mail on:

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/s/ Brewster S. Rawls